

FLYNN, DELICH & WISE LLP

ATTORNEYS AT LAW
One World Trade Center, Suite 1800
Long Beach, California 90831-1800
(562) 435-2626

Erich P. Wise/State Bar No. 63219
Aleksandrs E. Drumalds/State Bar No. 237101
FLYNN, DELICH & WISE LLP
One World Trade Center, Suite 1800
Long Beach, California 90831-1800
Telephone: (562) 435-2626
Facsimile: (562) 437-7555

James B. Nebel/State Bar No. 69626
Conte C. Cicala/State Bar No. 173554
FLYNN, DELICH & WISE LLP
One California Street, Suite 350
San Francisco, California
Telephone: (415) 693-5566
Facsimile: (415) 693-0410

Attorneys for Defendant
HANJIN SHIPPING CO., LTD.

UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF CALIFORNIA

Chelsea, LLC, Mark Russo, and Allen)	CASE NO.: CV-07-5800 SC
Loretz, individually and on behalf of)	
all others similarly situated,)	STIPULATION OF PLAINTIFFS
)	AND DEFENDANT HANJIN
Plaintiffs,)	SHIPPING CO., LTD. TO EXTEND
)	THE TIME FOR FILING AND
vs.)	SERVICE OF A RESPONSE TO
)	PLAINTFFS' VERIFIED SECOND
)	AMENDED CLASS ACTION
Regal Stone, Ltd., Hanjin Shipping)	COMPLAINT; ORDER THEREON
Co., Ltd., Synergy Maritime, Ltd.,)	
Fleet Management, Ltd., and John)	[Civil Local Rule 6-1(b)]
Cota, <i>In Personam</i> ; M/V Cosco)	
Busan, their engine, tackle,)	
equipment, appurtenances, freights,)	
and cargo, <i>In Rem</i> ,)	
)	
Defendants.)	

FLYNN, DELICH & WISE LLP
ATTORNEYS AT LAW
One World Trade Center, Suite 1800
Long Beach, California 90831-1800
(562) 435-2626

TO THE COURT AND ALL COUNSEL OF RECORD:

IT IS HEREBY STIPULATED by and between plaintiffs CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ (“Plaintiffs”) and defendant HANJIN SHIPPING CO., LTD, (“Hanjin”), through their respective counsel of record, that the time for Hanjin to file and serve a response to Plaintiffs’ Verified Second Amended Class Action Complaint is extended by twenty-one (21) days. Defendant Hanjin will file and serve its response to Plaintiffs’ Verified Second Amended Class Action Complaint no later than Friday, August 29, 2008.

This stipulation is not entered into for purposes of delay, but to permit defendant Hanjin to continue its investigation, to address the new allegations contained in Plaintiffs’ Verified Second Amended Class Action Complaint, and to allow defendant Hanjin to formulate a proper response.

IT IS SO STIPULATED AND AGREED.

Dated: August 4, 2008

AUDET & PARTNERS, LLP

By: /s/ William M. Audet (as authorized on 8/4/08)

William M. Audet

Attorney for Plaintiff

CHELSEA, LLC, MARK RUSSO, and
ALLEN LORETZ

Dated: August 4, 2008

FLYNN, DELICH & WISE LLP

By: /s/ Erich P. Wise

Erich P. Wise

Attorney for Defendant

HANJIN SHIPPING CO., LTD

ORDER

Based on the foregoing Stipulation, IT IS HEREBY ORDERED that the time for defendant HANJIN SHIPPING CO., LTD to file and serve a response to the Verified Second Amended Class Action Complaint of plaintiffs CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ is extended by twenty-one (21) days. Defendant is ordered to file and serve its response to Plaintiffs' Verified Second Amended Class Action Complaint no later than Friday, August 29, 2008.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

HON. SAMUEL CONTI
UNITED STATES DISTRICT JUDGE

FLYNN, DELICH & WISE LLP
ATTORNEYS AT LAW
One World Trade Center, Suite 1800
Long Beach, California 90831-1800
(562) 435-2626